



The Dow Chemical Company  
Midland, MI 48674  
U.S.A.

December 15, 2015

Document Processing Desk (DCI/AD)  
Attn: Re-evaluation Team Leader, PM 36  
US EPA (7510P)  
One Potomac Yard (South Building)  
2777 S. Crystal Drive  
Arlington, VA 22202

Overnight Mail

**Subject: – Glutaraldehyde - Generic and Product Specific Data Call In Response**  
**Generic ID# GDCI-043901-30859**  
**Product Specific ID# PDCI-043901-30503**

The Dow Chemical Company (Dow) hereby responds to the Generic and Product Specific Data Call In (DCI) Notice for Glutaraldehyde. Enclosed are the following:

- 1) Data Call In Response forms:
  - Generic – Enclosed is a completed form indicating that Dow agrees to satisfy the Generic data requirements for the applicable products. Dow further agrees to claim a Generic Data Exemption for products where this is applicable and has indicated this on the form.
  - Product Specific – Enclosed is a completed form indicating that Dow agrees to satisfy the MUP and EUP requirements as indicated on the attached forms.
- 2) Product Specific Requirements Status and Registrants' Response - Dow has indicated on the applicable product form how we intend to satisfy the data requirements for each product. Product Chemistry Waivers are enclosed for the following registration numbers to support waiving a requirement or relying on a higher concentration end point to meet a specific requirement.

Product Chemistry Waivers submitted for the following registration numbers:

EPA Reg. No. 464-691	EPA Reg. No. 464-704	EPA Reg. No. 464-705
EPA Reg. No. 464-692	EPA Reg. No. 464-714	EPA Reg. No. 464-690
EPA Reg. No. 464-688	EPA Reg. No. 464-706	EPA Reg. No. 464-8130
EPA Reg. No. 464-689	EPA Reg. No. 464-8133	EPA Reg. No. 464-693
EPA Reg. No. 464-707	Intentionally Blank	Intentionally Blank



The Dow Chemical Company  
Midland, MI 48674  
U.S.A.

It is important to note that EPA Reg. No. 464-700 and EPA Reg. No. 464-702 are under the Data Call In Notice for ADBAC ID# PDCI-069105-30933. As a result, enclosed is a copy of the response provided to the Agency in June, 2015 for these registration numbers under that DCI. The waiver request submitted for the acute toxicity studies is applicable to this DCI. We are awaiting word from the Agency on acceptance of this waiver which includes an alternative testing approach.

Let me know if you have any questions or if additional information is needed.

Sincerely,

A handwritten signature in cursive script that reads "Rhonda Vance-Moeser".

Rhonda Vance-Moeser  
Product Stewardship Regulatory Manager  
The Dow Chemical Company  
200 Larkin Center, 1501 Larkin Center Drive  
Midland, MI 48674  
Phone: (989) 636-1884  
E-mail: [rgvmoeser@dow.com](mailto:rgvmoeser@dow.com)

cc: Gregory J. Bradley  
Associate Director  
Global Regulatory Sciences and Product Sustainability  
Dow Microbial Control  
The Dow Chemical Company  
E-mail: [gjbradley@dow.com](mailto:gjbradley@dow.com)

Enclosures

United States Environmental Protection  
Agency Washington, D.C. 20460

OMB Approval 2070-174

## DATA CALL-IN RESPONSE

INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form.  
Use additional sheet(s) if necessary.

1. Company Name and Address DOW CHEMICAL CO., THE 100 LARKIN CENTER, 1650 JOSEPH DR. MIDLAND, MI 48674		2. Case # and Name 2315 Glutaraldehyde Chemical # and Name 043901 Glutaraldehyde		3. Date and Type of DCI and Number 28-Aug-2015 GENERIC ID # GDCI-043901-30859	
4. EPA Product Registration	5. I wish to cancel this product registration voluntarily	6. Generic Data		7. Product Specific Data	
		6a. I am claiming a Generic Data Exemption because I obtain the active ingredient from the source EPA registration number listed below.	6b. I agree to satisfy Generic Data requirements as indicated on the attached form entitled "Requirements Status and Registrant's Response."	7a. My product is an MUP and I agree to satisfy the MUP requirements on the attached form entitled "Requirements Status and Registrant's Response."	7b. My product is an EUP and I agree to satisfy the EUP requirements on the attached form entitled "Requirements Status and Registrant's Response."
464-688	NO	464-691 + 464-690	YES YES	N.A.	N.A.
464-689	NO	464-691 + 464-690		N.A.	N.A.
464-690	NO			N.A.	N.A.
464-691	NO			N.A.	N.A.
464-692	NO	464-691		N.A.	N.A.
464-693	NO	464-691 + 464-690		N.A.	N.A.
464-700	NO	464-691 + 464-690		N.A.	N.A.
464-702	NO	464-691		N.A.	N.A.
464-704	NO	464-691		N.A.	N.A.
464-705	NO	464-691		N.A.	N.A.
464-706	NO	464-691 + 464-690		N.A.	N.A.
464-707	NO	464-691 + 464-690		N.A.	N.A.
464-714	NO	464-691		N.A.	N.A.
464-718	NO	464-691		N.A.	N.A.
464-8130	NO	464-691 + 464-690		N.A.	N.A.
464-8133	NO	464-691 + 464-690		N.A.	N.A.
8. Certification I certify that the statements made on this form and all attachments are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine, imprisonment or both under applicable law.				9. Date 12/15/15	
Signature and Title of Company's Authorized Representative <i>Ronda Hance-Mann Regulatory Mgr.</i>					
10. Name of Company THE DOW CHEMICAL COMPANY				11. Phone Number 989-636-1884	



United States Environmental Protection  
Agency Washington, D.C. 20460

OMB Approval 2070-174

**REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE**

INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form.  
Use additional sheet(s) if necessary.

1. Company Name and Address DOW CHEMICAL CO., THE 100 LARKIN CENTER, 1650 JOSEPH DR. MIDLAND, MI 48674		2. Case # and Name 2315 Glutaraldehyde Chemical # and Name 043901 Glutaraldehyde			3. Date and Type of DCI and Number 28-Aug-2015 GENERIC ID # GDCI-043901-30859				
4. Guideline Requirement Number	5. Study Title	P R O T O C O L	Progress Reports			6. Use Pattern	7. Test Substance	8. Time Frame (Months)	9. Registrant Response
			1	2	3				
835.4100	<u>Environmental Fate Data Requirements (Antimicrobial)</u>  Aerobic soil metabolism (1,2)	N				V, R, U, <del>X</del> T, X, Z	TGAI  *MRID #: 47327102	24	6*
10. Certification I certify that the statements made on this form and all attachments are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine, imprisonment or both under applicable law.						11. Date			
Signature and Title of Company's Authorized Representative <i>Rhonda H Vance - Manager Regulatory Mgr.</i>						12/15/15			
12. Name of Company						13. Phone Number 989-636-1884			